

## NOTICE OF AMENDMENT

June 29, 1999

### **CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mr. Chris Girrens  
Vice President & General Manager  
Dixie Pipeline Company  
1117 Perimeter Center West, Suite 301 W  
Atlanta, Georgia 30338

**CPF NO: 29501-M**

Dear Mr. Girrens:

On May 25-27, 1999, representatives of the Southern Region and Southwest Region, Office of Pipeline Safety, pursuant to chapter 601 of 49 United States Code, conducted a joint inspection of the written procedures for conducting operations and maintenance activities and handling abnormal operations and emergencies at the Dixie Pipeline Company (DPL) office in Atlanta, Georgia. These procedures are required for each pipeline operator by Title 49, Code of Federal Regulation, Part 195, Section 195.402 (a).

As a result of this inspection, it appears that DPL has committed probable violations of the Hazardous Liquid Pipeline Safety Act (HLPSSA) regulations, 49 CFR Part 195. The items inspected and the probable violations are:

1.     **§ 195.54 Accident Reports**
  - (b) **Whenever an operator receives any changes in the information reported or additions to the original report on DOT Form 7000-1, it shall file a supplemental report within 30 days.**

DPL's operations, maintenance & emergency manual, revised in March, 1999, does not provide information regarding supplemental report.

2.     **§ 195.216 Welding: Miter joints.**

**A miter joint is not permitted (not including deflections up to 3 degrees that are caused by misalignment).**

DPL's welding procedures must include prohibition against miter joint.

3. **§ 195.226 Welding: Arc burns**

**(a) Each arc burn must be repaired.**

DPL's procedural manual must be expanded to include procedures for repair of arc burns.

4. **§ 195.234 Welds: Nondestructive testing.**

**(d) During construction, at least 10 percent of the girth welds made by each welder during each welding day must be nondestructively tested over entire circumference of the weld.**

DPL's welding manual, revised in November, 1992, does not address this subsection of the regulation.

**(e) (items 1 thru 5), (f), (g) requires the welding manual contain procedures for 100 percent nondestructive testing of all girth welds installed each day at certain locations except where it is impractical.**

DPL's welding manual does not include these procedures.

5. **§ 195.410 Line markers**

Information in section V-050 (P:1/2) of the DPL's procedural manual must be expanded to include all the applicable subsections of this regulation.

6. **§ 195.442 Damage prevention program**

**Requires each operator to carry out a written program to prevent damage to the pipeline by excavation activities.**

DPL's operation, maintenance and emergency manual does not include a damage prevention plan covering subsections (a), (b) (1-5) 6(i) of this regulation.

7. **§ 195.242 Cathodic protection system.**

**(b) A cathodic protection system must be installed not later than 1 year after completing the construction.**

DPL's operation, maintenance and emergency manual does not include this procedure.

In addition to the above mentioned items, it is recommended that you consider the following areas of concern.

- **Revise your procedure on excavated trenches to conform to current standard. 195.402(c)(14)**
- **IR drop free or off potential reading of -0.850 mv as a lower limit should be considered as a criteria for cathodic protection monitoring.**
- **A description of special monitoring surveys such as closed interval survey & coating survey should be included in your corrosion control procedures.**
- **A separate section on pigging, different methods and tools, should be included in your manual.**
- **A uniform color coding system of your test leads, used for corrosion control testing, should be outlined for proper identification of your pipelines and casings.**
- **A description of your storage tanks should be included in your manual if they are considered breakout tanks from a jurisdictional standpoint.**
- **No cross referencing is given in your manuals.**  
**A detailed table of contents should be developed for each DPL's manual with a handy reference.**

As provided in 49 C.F.R. 190.237, this notice serves as your notification that this office considers your procedures/plans inadequate. Under 49 C.F.R. 190.237, you have a right to submit written comments or request an informal hearing. You must submit written comments or a request for a hearing within 30 days after receipt of this notice. After reviewing the record, the Associate Administrator for Pipeline Safety will determine whether your plans or procedures are adequate. The criteria used in making this determination are outlined in 49 C.F.R. 190.237. If you do not wish to contest this notice, please provide your revised procedures within 30 days of receipt of this notice.

Please refer to CPF No. 29501-M in any correspondence and/or communication on this matter.

Sincerely,

Frederick A. Joyner  
Regional Director  
Office of Pipeline Safety

cc: Compliance Registry  
Headquarters, OPS